

Law Firm of Steven M. Warshawsky
www.warshawskylawfirm.com

118 North Bedford Road, Suite 100
Mount Kisco, New York 10549

Tel: (914) 864-3353
Email: smw@warshawskylawfirm.com

February 20, 2025

VIA ELECTRONIC CASE FILING

Hon. Denise L. Cote
United States District Court
500 Pearl Street, Rm. 1910
New York, NY 10007

Re: *Richardson v. National Basketball Ass'n, et al.*
Case No. 23-CV-6926-DLC (SDNY)

Dear Judge Cote:

I represent Plaintiff Leroy Richardson in this Title VII action asserting a claim for failure to accommodate Mr. Richardson's religious objections to the NBA's COVID-19 vaccination requirement. Today I filed Plaintiff's motion for summary judgment, including notice of motion, memorandum of law, and Plaintiff's Local Civil Rule 56.1 Statement of Undisputed Materials Facts, with attached Exhibits 1-14.

I am writing pursuant to Your Honor's Individual Practice Rules 4.D and 8.B to advise the Court that Plaintiff's memorandum of law and 56.1 statement and exhibits were filed presumptively under seal in accordance with Section 6 of the Stipulation and Order of Confidentiality dated 5/23/24 (ECF 47) because most of the documents and all of the deposition testimony relied upon by Plaintiff were designated "confidential" by the parties during discovery.

Although Plaintiff does not believe that these materials contain truly confidential or otherwise sensitive information (with the exception of third party names, which have been redacted), they are being filed under seal to avoid any disputes with Defendants (who have not had an opportunity to review the substance of Plaintiff's motion).

Nevertheless, Plaintiff does not object to filing the motion papers under seal and requests that the Court approve this procedure.

*the parties shall waive and file any
letter motion pursuant to § 87(2)(b) of
this Court's Individual Practices
by 2/25/25. J. M. Bk
2/20/25*

Respectfully submitted,

/s/ Steven M. Warshawsky

Steven M. Warshawsky
Attorney for Plaintiff

cc: All Counsel of Record (via ECF)